1 2 3 4 5 6	MICHAEL C. FALLON, SBN 088313 MICHAEL C. FALLON, JR., SBN 303082 100 E Street, Suite 219 Santa Rosa, California 95404 Telephone: (707) 546-6770 mcfallon@fallonlaw.net fallonmc@fallonlaw.net Attorneys for Debtor	
8 9	UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA	
10	In Re:	Case No. 25-10088 WJL
11	Kingsborough Atlas Tree Surgery, Inc.	Chapter 11
12 13	Debtor.	NOTICE OF CONDITIONAL WITHDRAWAL OF MOTION FOR AUTHORITY TO SELL PERSONAL PROPERTY
14		PROPERTY
15 16 17		Date: July 1, 2025 Time: 9:30 am Ctrm: 1300 Clay Street, Room 220 Oakland, CA 94612 Video Conference
18	TO: COMMERCIAL CREDIT GROUP AND PARTIES IN INTEREST	
19	NOTICE is hereby given that Kingsborough Atlas Tree Surgery, Inc. ("Debtor") hereby	
20	conditionally withdraws its motion for authority to sell equipment to Davey Tree Expert	
21 22	Company (Dkt No. 112). If Anvil Builders, the only party to object to the sale, withdraws its	
23	objection and consents to the sale under 11 USC § 363(f), the motion will be heard at the	
24	continued hearing on July 1, 2025. However, if Anvil Builders continues to object, the motion	
25	will be withdrawn.	
26		
27 28	Dated: June 11, 2025	/s/ Michael C. Fallon Michael C. Fallon Attorney for Debtor
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